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UNITE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Case No. 5:14-cv-05484-EJD
5:14-cv-05591-EJD
5:14-cv-05621-EJD
5:15-cv-00521-NC**

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED PURSUANT
TO CIVIL L.R. 3-12 AND 7-11 5:14-cv-0**

5:14-cv-05484-EJD
5:14-cv-05591-EJD
5:14-cv-05621-EJD
5:15-cv-00521-NC

**Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Gabe Ruediger and Mac Danzig, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger and Mac Danzig (collectively, “Plaintiffs”) submit this administrative motion requesting the Court to consider whether *Ruediger et al v. Zuffa, LLC*, Case No. 5:15-cv-00521-NC (the “*Ruediger*

5:14-cv-05484-EJD
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1 Action”), filed in this District on February 4, 2015, should be related to the instant and first filed action,
 2 *Le et al. v. Zuffa LLC*, Case No. 5:14-cv-05484-EJD (the “*Le* action”), filed December 16, 2014.

3 Civil Local Rule 3-12(a) provides that actions are related when (1) the actions concern substantially
 4 the same parties, property, transaction or event; and (2) it appears likely that there will be an unduly
 5 burdensome duplication of labor and expense or conflicting results if the cases are conducted before
 6 different judges.

7 The *Ruediger* Action should be related to the instant action because these actions together readily
 8 meet the criteria for relation set forth above. Indeed, no substantive difference exists between the
 9 allegations and claims for relief in the *Ruediger* Action and in the instant action. The *Ruediger* Action
 10 alleges facts and asserts claims involving the same scheme of anticompetitive behavior as that alleged in
 11 the *Le* Action. As in the instant case, the *Ruediger* plaintiffs have filed suit to seek recovery on behalf of
 12 two classes: (1) “Bout Plaintiffs”—Elite Professional Mixed Martial Arts (“MMA”) Fighters who fought
 13 in at least one bout promoted by defendant Zuffa¹; and (2) “Identity Plaintiffs”—Elite Professional
 14 MMA Fighters whose Identity was expropriated or exploited by Zuffa. Identically to the *Le* plaintiffs,
 15 Plaintiffs Ruediger and Danzig seek class damages and injunctive relief for monopolization under Section
 16 2 of the Sherman Act, 15 U.S.C. § 2. Like the *Le* Plaintiffs, Ruediger and Danzig allege a class period
 17 running from December 16, 2010 to the present.

18 The class period, the material allegations, the relief sought, and the defendant are the same in the
 19 two cases. As such, these two cases will require adjudication of the same questions of law and fact.
 20 Relation of the *Ruediger* Action to the first-filed *Le* Action therefore will promote the conservation of
 21 judicial and party resources in these cases and will ensure efficiency in their prosecution and final
 22 disposition. On the other hand, were the *Ruediger* Action to proceed separately from the *Le* Action, the
 23 Court and the parties would experience unduly burdensome duplication of labor and expenses and would
 24 face the possibility of conflicting results.

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 26
 27
 28 ¹ “Zuffa” refers to Zuffa, LLC and its registered trademarks Ultimate Fighting Championship® and
 UFC®.

1 Therefore, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd
2 Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger and Mac Danzig respectfully request that the Court
3 relate the *Ruediger* Action to the *Le* Action.

4 Dated: February 9, 2015

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